

**Remarks**

Entry of the above-noted amendments, reconsideration of the application, and allowance of all claims pending are respectfully requested. By this amendment, claims 1, 13, 18, 20, 24-26, 30, and 32 are amended and claims 29 and 31 are canceled. These amendments to the claims constitute a bona fide attempt by applicants to advance prosecution of the application and obtain allowance of certain claims, and are in no way meant to acquiesce to the substance of the rejections. It is believed that the amendments made herein place the entire application in condition for allowance and/or better form for appeal. These amendments were not made earlier because the claims as previously submitted were believed to be in condition for allowance. Support for the amendments can be found throughout the specification (c.g., page 8, lines 4-6), drawing FIG. 1, and claims (c.g., previous claims 29 and 31) and thus, no new matter has been added. Claims 1-28, 30, and 32 are pending.

**Claim Rejections - 35 U.S.C. § 102:**

Claims 1-32 are rejected under 35 U.S.C. § 102(b) as being anticipated by Bilski et al. (U.S. Patent No. 6,351,381; "Bilski"). Claims 1-32 are rejected under 35 U.S.C. § 102(e) as being anticipated by Cheon (U.S. Patent Application Publication No. 2004/0008483). These rejections are respectfully, but most strenuously, traversed.

It is well-settled that there is no anticipation unless (1) all the same elements are (2) found in exactly the same situation and (3) are united in the same way to (4) perform the identical function. Since the Office Action's citations to each of the applied references is missing at least one element of each of applicants' independent claims, applicants respectfully submit that the claimed invention is not anticipated by the Office Action's citations to the applied references, as further discussed below.

For explanatory purposes, applicants discuss herein one or more differences between the Office Action's citations to the applied references and the claimed invention with reference to one or more parts of the applied references. This discussion, however, is in no way meant to acquiesce in any characterization that one or more parts of the Office Action's citations to the applied references correspond to the claimed invention.

Applicants respectfully submit that the Office Action's citations to the applied references do not teach or suggest one or more elements of the claimed invention. A careful reading of the Office Action's citations to the applied references fails to teach or suggest, for example, wherein the one or more heat exchanger components are coupled with one of a front or rear surface of the rack-mounted computer chassis without in major part extending beyond vertical and horizontal dimensions of the one of the front or rear surface of the rack-mounted computer chassis, wherein a location of the one or more heat exchanger components at the front or rear surface of the rack-mounted computer chassis serves to allow a user to move the rack-mounted computer chassis in and out of a rack without uncoupling the one or more heat exchanger components from the rack-mounted computer chassis, as recited in applicants' independent claim 1.

Bilski discloses (column 3, lines 26-29) that "several electronics modules 20 are supported in each of a plurality of racks 26 which are mounted, side-by-side, within a bottom portion 28 of electronic systems cabinet 18." The individual electronics modules 20 are the only rack-mounted devices disclosed in Bilski. The electronic systems cabinet 18 also contains a primary heat exchange assembly 100 and a distribution manifold 113. The primary heat exchange assembly 100 and the distribution manifold 113 are in major part located beyond the vertical and horizontal dimensions of a front or rear surface of one electronics module 20. For example, the distribution manifold 113 alone is shown in FIGS. 1 and 2 to extend a horizontal length equal to six electronics modules 20. Furthermore, when

the electronics modules 20 are moved out of the rack 26, the electronics modules 20 will be uncoupled from the primary heat exchange assembly 100 and the distribution manifold 113.

Simply missing from the Office Action's citation to Bilski is any mention of the one or more heat exchanger components that are coupled with one of a front or rear surface of the rack-mounted computer chassis without in major part extending beyond vertical and horizontal dimensions of the one of the front or rear surface of the rack-mounted computer chassis, wherein a location of the one or more heat exchanger components at the front or rear surface of the rack-mounted computer chassis serves to allow a user to move the rack-mounted computer chassis in and out of a rack without uncoupling the one or more heat exchanger components from the rack-mounted computer chassis, as recited in applicants' independent claim 1.

So, the Office Action's citation to Bilski fails to satisfy at least one of the limitations recited in applicants' independent claim 1.

Cheon discloses (FIGS. 9-11) a coolant supply distribution unit 20 for industrial rack mount PCs. The coolant supply unit 20 is located at a topmost layer of a stack of rack mount PCs. For example, FIGS. 9-11 illustrate the coolant supply unit 20 stacked above the chassis of the electronic device 1. Paragraph [0056] recites: "[t]he coolant supply unit 20 is installed at the topmost layer...." Paragraph [0061] recites: "the coolant supply unit 20 is preferably installed at the topmost layer to promote smooth dissipation of heat and induce vertical circulation in the coolant tank." The Office Action's citation to Cheon fails to disclose the coolant supply unit 20 coupled with a front or rear surface of the electronic device 1 without the coolant supply unit 20 in major part extending beyond vertical and horizontal dimensions of the one of the front or rear surface of the electronic device 1. In fact, the coolant supply unit 20 is in major part located beyond the vertical and horizontal dimensions of the front or

rear surface of the electronic device 1. The coolant supply unit 20 is stacked on top of the electronic devices thereby increasing the overall vertical height of the stack.

Furthermore, Cheon discloses coolant pipes 34 and 301 that extend down from the coolant supply unit 20 to distribute coolant to the electronic devices 1. Intermediate circulation pumps 33 and ports 31 of the distribution system 30 connect each of the electronic devices 1 to the coolant pipes 34 and 301. If the electronic devices 1 are moved out of the rack, then the ports 31 of the electronic devices 1 will disconnect from the ports of the Intermediate circulation pumps 33. Therefore, when the electronic devices 1 are moved out of the rack, the electronic devices 1 will be uncoupled from the coolant supply unit 20.

Simply missing from the Office Action's citation to Cheon is any mention of the one or more heat exchanger components that are coupled with one of a front or rear surface of the rack-mounted computer chassis without in major part extending beyond vertical and horizontal dimensions of the one of the front or rear surface of the rack-mounted computer chassis, wherein a location of the one or more heat exchanger components at the front or rear surface of the rack-mounted computer chassis serves to allow a user to move the rack-mounted computer chassis in and out of a rack without uncoupling the one or more heat exchanger components from the rack-mounted computer chassis, as recited in applicants' independent claim 1.

So, the Office Action's citation to Cheon fails to satisfy at least one of the limitations recited in applicants' independent claim 1.

Furthermore, the Office Action does not allege that the art of record provides any teaching, suggestion, or incentive for modifying the citations to Bilski and/or Cheon to provide the claimed configuration.

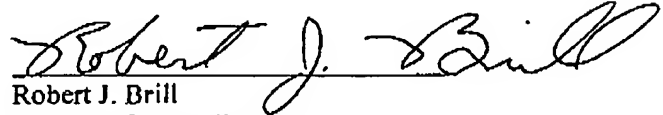
For all the reasons presented above with reference to claim 1, claims 1, 18, and 25 are believed neither anticipated nor obvious over the art of the record. The corresponding

dependent claims are believed allowable for the same reasons as independent claims 1, 18, and 25, as well as for their own additional characterizations.

Withdrawal of the § 102 rejections is therefore respectfully requested.

In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicants' attorney.

Respectfully submitted,



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